UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JEFFREY S. VAUGHN, individually and on behalf of those Class Members similarly situated,

Plaintiff,

v.

LEEDS, MORELLI & BROWN, P.C., LEEDS, MORELLI & BROWN, L.L.P., LEEDS & MORELLI, LEEDS, MORELLI & BROWN, PRUDENTIAL SECURITIES, INC., PRUDENTIAL FINANCIAL, INC., LENARD LEEDS, STEVEN A. MORELLI, JEFFREY K. BROWN, and JOHN DOES, JAMES VAGNINI, FREDERIC DAVID OSTROVE, ROBERT JOHN VALLI, JR., DISCRIMINATION ON WALL STREET, INC. DISCRIMINATION ON WALL STREET MANHATTAN, INC., JOHN DOES, 1-10 AND JANE DOES, 1-10 a fictitious designation for presently unknown licensed attorneys, professionals and/or unknown persons or entities,

Defendants.

04 Civ. 08391 (DLC)

STIPULATION AND PROPOSED ORDER

WHEREAS, the parties desire to establish a schedule for the briefing of plaintiff's motion to lift the pending stay in this matter and vacate the arbitration award dated May 10, 2007, and the filing and briefing by defendants of any cross-motion(s) to confirm the arbitration award,

IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel, as follows:

1. Defendants shall serve and file their papers in opposition to plaintiff's motion to vacate, and any cross motion(s) to confirm on or before September 14, 2007.

- 2. Plaintiff shall serve and file reply papers in further support of his motion to vacate, and papers in opposition to any cross-motion(s) to confirm on or before October 10, 2007.
- 3. Defendants shall serve and file reply papers in further support of any cross-motion(s) to confirm on or before October 24, 2007.

Dated:

New York New York

August∕≤, 2007

LIDDL

By:

Blaine H. Bortnick

800 Third Avenue New York, NY 10022

Attorneys for Plaintiff

Dated:

New York, New York August 15, 2007

LITCHFIELD CAYO LLP

By:

Daniel T. Hughes

420 Lexington Avenue

Suite 1750

New York, NY 10170

Attorneys for Leeds, Morelli & Brown, P.C. and individual Defendant members or associates of Leeds, Morelli & Brown, P.C.

Dated:

New York, New York August <u>2007</u>

PAUL, WEISS, RIFKIND, WHARTON

By:

1285 Avenue of the Americas

New York, NY 10019

Attorneys for Prudential Securities, Inc.

and Prudential Financial, Inc.

SO ORDERED this	day of	, 2007.
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